

Rain Levy Minns, TX Bar No. 24034581
Minns Law Firm, P.C.
d/b/a Rain Minns Law Firm
4412 Spicewood Springs Rd, Suite 500
Austin, TX 78759
Tel.: 512-372-3222
Fax: 512-861-2403

Kevin W. Bons, OSB No. 066963
Beckley & Bons, P.C.
Attorneys At Law
66 Club Road, Suite 360
Eugene, Oregon 97401
Tel.: 541-683-0888
Fax: 541-683-0889

ATTORNEYS FOR CLAIMANT TALON V. WHITE

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

| | |
|---------------------------------|------------------------------------|
| UNITED STATES OF AMERICA, |) Case No. 6:19-cv-00707-BR |
| Plaintiff, |) |
| vs. |) VERIFIED CLAIM FOR SEIZED |
| |) PROPERTY |
| |) |
| |) |
| \$2,457,790.72 IN FUNDS, et al. |) |
| Defendants |) |
| _____ |) |
| TALON V. WHITE, |) |
| Claimant |) |

Claimant Talon V. White (hereinafter "Claimant"), by and through his undersigned counsel hereby files his Verified Claim, pursuant to Rule g(5) of Title XII, Supplemental Rules for Certain Admiralty or Maritime and Asset Forfeiture Claims of the Federal Rules of Civil Procedure, and states:

I.

1. Claimant is the owner/trustee of the following property seized by the Government:
 - a. \$2,457,790.72 seized from a JP Morgan Chase Platinum Business Checking account ending in 0905, in the name of Viral Sensations Inc.;
 - b. \$1,266,650.00 seized from a JP Morgan Chase Platinum Business Checking account ending in 3511, in the name of Viral Sensations Inc.;
 - c. \$1,383.68 seized from a JP Morgan Chase Platinum Business Checking account ending in 2125, in the name of Viral Sensations Inc.;
 - d. \$200,653.71 seized from my JP Morgan Chase Premier Platinum Checking account ending in 8881;
 - e. \$32,921.00 in US Currency seized from my residence at 935 SW 7th St, Newport, Lincoln County, Oregon;
 - f. \$1,940.77 in US Currency seized from my Stripe account;
 - g. 31.53810677 BTC in Bitcoin seized from my Coinbase account;
 - h. 1,022.39066800 ETH in Ethereum, seized from my Coinbase account; and
 - i. 5.74017141 BCH in Bitcoin Cash seized from my Coinbase account.
2. Claimant, who has not been convicted of any crimes, hereby demands that the Government return and/or release the seized Property in the instant case to Claimant, the rightful owner.
3. Wherefore premises considered, Claimant Talon V. White respectfully prays that the Court will dismiss the Government's Complaint, return his Property, assess all costs against the

Government and grant such other and further relief, at law or in equity, to which Claimant may prove to be justly entitled.

Respectfully Submitted June 17th 2019.

/s/ Rain Levy Minns
Rain Levy Minns, TX Bar No. 24034581
rain@rainminnslaw.com
(pro hac vice)

/s/ Kevin W. Bons
Kevin W. Bons, OSB No. 066963
kbons@beckley-law.com
(local counsel)

Attorneys for Claimant White

CERTIFICATE OF SERVICE

I certify that on June 17th 2019, the undersigned served this document via CM/ECF and/or USPS in accordance with the Federal Rules of Civil Procedure on the following parties:

Amy E. Potter, AUSA
United States Attorney's Office
1000 SW 3rd Ave., Suite 600
Portland, OR 97204
Tel: 541-465-6356
Amy.potter@usdoj.gov

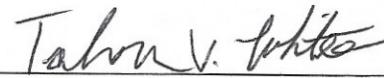
/s/ Kevin W. Bons
Local Counsel for Claimant White

VERIFICATION

State of Oregon)
)
County of Lincoln)

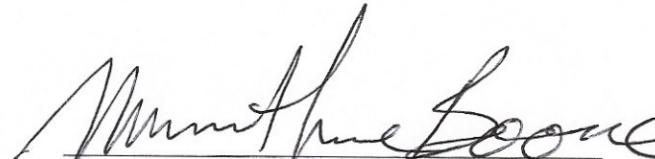
BEFORE ME, the undersigned authority, on this day, personally appeared TALON V. WHITE, known to me, who, being by me first duly sworn, did depose upon his oath under penalty of perjury that he has read the foregoing paragraph 1 of the *Verified Claim*, and that the facts, matters, and representations made therein are within his personal knowledge and are true and correct.

DATED this 14 day of June 2019.


TALON V. WHITE

SUBSCRIBED AND SWORN TO before me this 14 day of June 2019.




Notary Public for Oregon
My commission expires: Sept 5 2020